

1 The Honorable Richard A. Jones  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 LEGACY PRODUCTIONS LTD.,

Case No. 09-01822-RAJ

11 Plaintiff,

12 v.  
13 COMBINED JOINT STATUS  
14 U2 HOME ENTERTAINMENT, INC et  
al.,  
15 Defendants.

REPORT AND DISCOVERY  
PLAN (FRCP 26(F) AND CR 16)

16 The Parties to the case provide the following summary pursuant to the Order of January  
17  
18 4, 2010, as later modified by the Court on March 1, 2010. All statements are agreed unless  
19 otherwise stated.

20 **1. Nature and complexity of the case**

21 This is a straightforward copyright infringement case concerning allegedly  
22 unauthorized distribution of the film "Bruce Lee's Jeet Kune Do." The case also includes  
23 associated claims for falsification of copyright management information, removal of  
24 copyright management information, and trademark infringement.

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27 Combined Joint Status Report and Discovery  
Plan (FRCP 26(f) and CR 16)  
Case No. 09-01822-RAJ

IMUA LEGAL ADVISORS  
1752 NW Market St., # 211  
Seattle, WA 98107  
Tel 206-903-8182 Fax 206-903-8183

1       **2. ADR methods**

2           The Parties will employ CR 39.1 mediation.

3       **3. Timing of ADR**

4           Mediation should take place no later than the close of discovery.

5       **4. Deadline for joining additional parties**

6           June 29, 2010.

7       **5. Proposed discovery plan**

8           a. *Dates of Rule 26(f) Conference and Initial Disclosures.*

9           The FRCP 26(f) conference took place via telephone on April 5, 2010. The Parties  
10          have agreed to extend the deadline for FRCP 26(a) initial disclosures to April 30, 2010.

11           b. *Discovery*

12          The Parties anticipate discovery of the details of the creation and use by the Parties of  
13          the film "Bruce Lee's Jeet Kune Do." Discovery should not be conducted in phases or be  
14          limited to or focused on particular issues.

15           c. *Special limitations on discovery*

16          None.

17           d. *Management of discovery for economy*

18          The Parties have exchanged documents informally and expect to continue to do so. The  
19          Parties also agree to accept service by email of documents no longer than 50 pages.

20           e. *Other*

21          Defendant expects a protective order may be needed to shield confidential and  
22          proprietary information.

1           **6. Date for completion of discovery**

2           September 30, 2010.

3           **7. Referral to a Magistrate Judge**

4           Not applicable.

5           **8. Bifurcation**

6           No.

7           **9. Dispensing with pretrial statements and orders**

8           No.

9           **10. Additional suggestions for shortening or simplifying**

10           None.

11           **11. Date the case will be ready for trial**

12           February 2011.

13           **12. Jury**

14           Plaintiff has demanded a jury trial.

15           **13. Number of trial days**

16           Four (4).

17           **14. Trial Counsel**

18           *a. For Plaintiff*

19           John E. Grant III  
20           Eric S. Meltzer  
21           Imua Legal Advisors  
22           1752 NW Market St., #211  
23           Seattle, WA 98102  
24           206-903-8182  
25           Email: john@imualaw.com

1 Email: eric@imualaw.com

2 *b. For Defendant*

3 Stuart Dunwoody  
4 Ambika Doran  
5 Davis Wright Tremaine LLP  
6 1201 Third Avenue, #2200  
7 Seattle, WA 98101  
8 206-622-3150  
Email: stuardunwoody@dwt.com  
Email: AmbikaDoran@dwt.com

9 **15. Service dates for additional parties**

10 Not applicable.

11 **16. Scheduling conference prior to a scheduling order being entered**

12 Neither party requests one.

13  
14 Signature page follows.

1 Dated this 13<sup>th</sup> day of April, 2010.

2 /s/ Eric S. Meltzer  
3 John E. Grant III (WSBA # 39539)  
4 Eric S. Meltzer (WSBA # 40203)  
5 Imua Legal Advisors  
6 1752 NW Market St., #211  
7 Seattle, WA 98102  
8 206-903-8182  
Email: john@imualaw.com  
Email: eric@imualaw.com  
Counsel for Plaintiff Legacy Productions Limited

9 /s/ Ambika Doran  
10 Stuart Dunwoody (WSBA # 13948)  
11 Ambika Doran (WSBA # 38237)  
12 Davis Wright Tremaine LLP  
13 1201 Third Avenue, #2200  
Seattle, WA 98101  
206-622-3150  
Email: stuardunwoody@dwt.com  
Email: AmbikaDoran@dwt.com  
Counsel for Defendant U2 Home Entertainment, Inc.

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